



THE METROPOLITAN WATER DISTRICT  
OF SOUTHERN CALIFORNIA

December 2, 2013

Paul Massera  
California Water Plan Update 2013  
California Department of Water Resources  
P.O. Box 942836  
Sacramento, CA 94236

SUBJECT: COMMENTS ON CALIFORNIA WATER PLAN UPDATE 2013, VOLUME 3

Dear Mr. Massera,

The Metropolitan Water District of Southern California (Metropolitan) appreciates this opportunity to comment on the public review draft ("PRD") of Volume 3 of the California Water Plan Update for 2013 ("CWP 2013 Update"). Metropolitan seeks to enhance collaboration and coordination of water resource planning among all California stakeholders and supports DWR's efforts to do so.

Further detailed comments are provided in Attachment A. If you have any questions regarding these comments or need additional information, please contact Grace Chan at [gchan@mwdh2o.com](mailto:gchan@mwdh2o.com) or (213) 217-6403.

Sincerely,

*Grace Chan*

Manager, Resource Planning & Development Section  
Metropolitan Water District of Southern California

ATTACHMENT A: SPECIFIC COMMENTS AND SUGGESTIONS FOR CWP 2013 UPDATE		
Reference		Comments
<i>Chapter 3: Urban Water Use Efficiency</i>		
p. 1 line 11		Add, “(MWELO) <u>and advances in irrigation technology</u> ;...)
p. 2 lines 1 -5		Fix run-on sentence.
p. 4 line 10		The CWP 2013 Update should not be reporting that agencies have already met their 2020 target. Compliance is intended to be determined by whether an agency is at or below their 2020 target when they report in 2020. Suggest changing to, “and some have already <u>observed per capita use below their 2020 target</u> .”
p. 4 line 36		Each agency does not have to achieve a 20% reduction. Suggest changing to, “strategy for achieving the <u>2015 and 2020 per capita targets</u> .”
p. 5 line 8		Change, “landscape irrigation presents <del>the greatest</del> <u>a significant</u> opportunity...”
p. 6 line 26, p. 8 line 5		Why use 2009 water use data but 2000 population data?
p. 16 line 7		Change, “ <u>Non-potable rainwater capture system</u> standards are printed...”
p. 16 line 25		Include some discussion on the impact of graywater systems on recycled water. Some areas have invested significantly in recycled water systems; gray water systems may impact the economic benefit of those investments.
p. 22 line 26		This recommendation is being considered by DWR’s Independent Technical Panel. The recommendation should come through that process rather than the Water Plan.
p. 22 line 41		Study should also consider impact to recycled water systems.
Figure 3-1		Cite source.
Figure 3-2		Cite source and define gray-shaded bars.
Figure 3-4		Why not use data from IRWD 2011 study that was referenced extensively in the text?
Box 3-3 line 4		Add, “controllers, <u>soil moisture sensors</u> ,...”
Box 3-4 line 14		Add, “and notify the customer <u>and the irrigator</u> ...”
<i>Chapter 9: Conjunctive Management and Groundwater</i>		
p. 9-9 lines 22-23		The CWP 2013 Update does not appear to be consistent with the California Water Action Plan, Public Review Draft. Page 12 of the Water Action Plan indicates that the State is planning to update Bulletin 118. Page 9-9, lines 22-23 of the CWP 2013 Update indicate that Bulletin 118 is unlikely to be updated due to lack of funding. The CWP 2013 Update goes on to suggest on the following pages that DWR would update and expand the State’s groundwater information through an expansion of CASGEM and inclusion of discussion in future Water Plan Updates. This discrepancy should be addressed and a clear view of the reporting strategy provided.
p. 9-10 lines 35-39		These lines explain that DWR’s initial inventory of conjunctive management agencies and projects in the Water Plan Update was not as successful as intended because of the reluctance of local and regional water agencies to release data, primarily due to uncertainty in state regulations pertaining to groundwater recharge. The recommendations for conjunctive management should give priority to addressing this uncertainty.
p. 9-12		The CWP 2013 Update and the California Water Action Plan are also inconsistent with respect to approaches to improve sustainable groundwater management. The CWP 2013 Update (page 12) states, <p>“The administration will take steps, including sponsoring legislation if necessary; to define local responsibilities and to give local agencies the authority necessary to manage groundwater sustainably and ensure no groundwater basin is in danger of being permanently damage by over drafting. When a basin is at risk of permanent damage, and, after having been provided the needed authority, local agencies do not make sufficient progress to correct the problem in a timely manner; the state should have carefully-defined authority to protect the basin and its users until an adequate local program is established.” In contrast, the Water Plan Update indicates that the state will seek to amend the Water Code to give DWR authority to “evaluate and assess groundwater management and planning, and to develop groundwater management and implementation guidelines.”</p> <p>No mention is made of steps to improve authority of local agencies to manage and enforce groundwater management plans. Better alignment of these two water planning documents is needed.</p>
p. 9-19 lines 10-16		This chapter includes very helpful paragraph indicating the, <p>“urgent and critical need for increased capacities for both surface water storage systems and Delta conveyance</p>

		facilities...In the new reality (regulatory restrictions and climate change) absence of additional surface water storage and Delta conveyance would be critical limiting factors to manage water resources effectively and to derive optimal benefit from conjunctive management practices.”
p. 9-20 lines 10-15		The CWP 2013 Update states, “Management of the entire groundwater basin or hydrologic region is essential for effective conjunctive water management. Conjunctive management will be more effective and efficient if multiple hydrologic regions work together so that the weaknesses and strengths of regions can be coordinated and used for mutual benefit. However the existing legal and regulatory framework on groundwater use will make it very difficult to plan any large-scale conjunctive water management strategies because groundwater management is a local responsibility (Sax 2002).” Metropolitan’s Central Valley storage programs fit this description, and have been implemented using local management of groundwater. The water quality exchanges have worked as well, leading to the conclusion that: 1. The local management of groundwater has <b>not</b> prevented statewide conjunctive use. 2. Agencies which have implemented successful programs should be consulted for insights into specific problems or hurdles that, if removed, would increase the ability for multi-region cooperation.
p. 9-22 lines 24-25		The text references an unpublished paper, indicating that the paper illuminates critical issues that could potentially hinder widespread conjunctive management in the Sacramento Valley. Suggest that the paragraph either describe those critical issues or be deleted.
p. 9-23 lines 26-27, lines 38-42		Recommendation 3A states, “By January 1, 2016, Governor’s Office of Planning and Research (OPR) will develop a coordination plan to disseminate groundwater information.” Recommendation 3D ( Lines 38-42) states, “By December 31, 2018, DWR will work with SWRCB to implement a web-based Water Planning and Information Exchange (Water PIE)...” Delete until/unless these items can be more fully described.
p. 9-24 lines 12-14		Item C indicates that the State will expand CASGEM to use as a vehicle to update and maintain groundwater information in the future. Currently CASGEM focuses only on provision of groundwater elevation data. Counties and groundwater management agencies that do not volunteer to provide the elevation data for CASGEM are not eligible for state water grants or loans (Water Code section 10933.7). It is not clear that the scope and funding incentive of CASGEM can be expanded as proposed without legislation to revise the CASGEM provisions in the California Water Code.
p. 9-26 lines 10-11		Recommendation 8A states, “By January 1, 2016, the Legislature will revise the Water Code to i) include disincentives to overdraft groundwater basins and ii) include incentives for increasing recharge.” Delete until/unless the types of measures can be more fully described.
Chapter 10. Desalination (Brackish and Sea Water		
	Please see the comments Metropolitan provided in collaboration with CalDesal.	
Chapter 12. Municipal Recycled Water		
p. 12-14 lines 3-4		“Some water agencies...” should read, “Some agencies...”
Chapter 14: Surface Storage—Regional /Local		
p. 14-2		Recommend addition of paragraphs between lines 15 and 16 describing use of existing surface storage to facilitate groundwater recharge and conjunctive use. Add the following text: “Some surface storage is used to provide flood control benefits and to facilitate capture of stormwater for recharge of downstream groundwater basin(s) used for local water supply. Water conservation pools have been established by USACE at Seven Oaks Dam and Prado Dam on the Santa Ana River. Captured water is released slowly for groundwater recharge and use by downstream water managers. The Los Angeles County Flood Control District also holds water behind many local dams for subsequent release and spreading to recharge groundwater. The Southern California Water Committee Stormwater Task Force has initiated discussions with USACE to determine if additional stormwater could be captured at the federal flood control reservoirs for water supply purposes. Some water agencies also use their surface storage for imported water deliveries for groundwater recharge. Accumulation of sediment in flood control reservoirs has reduced capacity for both flood management and stormwater conservation. See Chapter 26. Sediment Management.”

<i>Chapter 16. Groundwater/Aquifer Remediation</i>		
	p. 16-6 lines 12-14	<p>The CWP 2013 Update states,  “Emerging contaminants may not be known at current detection levels. The impact of emerging contaminants is also not known. The ability to remediate emerging contaminants is not fully known, although research is being conducted. Reverse osmosis and advanced oxidation processes may prove to be adequate water treatment technologies.”</p> <p>The statements imply that remediation is the appropriate response to newly detected compounds at concentrations in the parts per trillion. However, it is not at all clear that costly, energy-intensive remediation is warranted. Research is needed to better understand the potential for these compounds singly or in combination to adversely impact aquatic species and public health at these ultra-low concentrations.</p>
<i>Chapter 19. Salt and Salinity Management</i>		
	Overall	<ul style="list-style-type: none"> <li>• Very well written, good organization. Kudos to the authors!</li> <li>• The Colorado River Salinity Control Forum is not really mentioned or discussed. True, it’s a Federal project, but the chapter should include recommendations for California to continue to support the program.</li> <li>• The role of brackish groundwater desalters as a salinity control success story in Southern California is buried in the text and should be highlighted.</li> <li>• The chapter includes recommendations on the need for expanding the collection and sharing of salinity data, without describing what the information would be used for and who would pay for it.</li> <li>• Inclusion of some of the ideas and issues raised in SCSC’s 2012 Salinity Summit could help inform the recommendations.</li> </ul>
	p. 19-3 paragraph 1	Salts in the South Coast region are also removed through wastewater outflows as well as streamflows. A 1999 study suggested a net salt accumulation of 600,000 tons per year.
	p. 19-4 paragraph 3	Cites State Water Contractors estimated a \$95 million/year benefit of reducing SWP salinity from a Delta Fix. This sounds like the results from the 1999 Salinity Study from a 100 mg/L salinity reduction.
	p. 19-5 paragraph 2	Discussion of the Salton Sea and how conservation efforts are negatively impacting it. No discussion of the water supply benefits and fact it is being artificially sustained.
	p. 19-6 paragraph 5	Discussion of source control does not include any mention of the Colorado Salinity Control Forum.
	p. 19-7 paragraph 2	Groundwater desalters are already cost-effective in many areas. Not sure why seawater desalination is mentioned here, as it is not a salinity control technology, unless it is used to blend down higher salinity water supplies.
	p. 19-9 paragraph 1	Discussion of real-time salinity management is great, but it sounds like this technology is under development, and this should be highlighted as “Potential New Strategies.”
	p. 19-13 paragraph 2	Alludes to salinity control in the upper Colorado River basin. The forum efforts should be day-lighted in the chapter, perhaps with a case-study.
	p. 19-14 paragraph 2	This section appears to advocate for a state-wide strategy, while most of the salinity control work already underway is implemented in individual basins.
	p. 19-16 paragraph 2	Last sentence suggests that regions may have to balance water use efficiency with higher salt concentrations, and may have to compromise between the two.
	p. 19-16 paragraph 3	Delete: “ <i>that seemed like a good idea at the time</i> ”
	p. 19-20	Short-term: Under recommendation 2, add language that California should also support the USBR’s Colorado River Salinity Control Forum.
	p. 19-20	Recommendation 3B to centralize water quality and flow data: Which agency collects and maintains – how would the data be used? It also recommends specific software – probably not appropriate for a state plan.
	p. 19-21	Perhaps add a 4E, calling for increased funding in the short-term for salinity projects including public outreach.
	p. 19-22	Calls for DWR and USBR to participate in development of regional salinity management plans. Aren’t these already called for as part of the Recycling Salt/Nutrient plans? Would end up with redundant efforts.
<i>Chapter 20. Urban Stormwater Runoff Management</i>		
	p. 20-5	The CWP 2013 Update states,

	lines 18-23	<p>“Information about statewide costs to implement urban stormwater runoff management activities is not available. The SWRCB contracted with the Office of Water Programs at California State University, Sacramento, to survey six communities to estimate costs of complying with their NPDES stormwater permits.”</p> <p>The Southern California Water Committee Stormwater Task Force has initiated development of a database of stormwater capture projects that provides some preliminary estimates of the cost per acre-foot for water supply development for different types of regional and on-site stormwater capture projects.</p>
	p. 20-8, p. 20-9	<p>Add to recommendations: “Develop statewide database tracking implementation costs and effectiveness of stormwater projects for increasing water supply and improving surface water quality. Develop criteria to prioritize and refine future projects that are most cost effective.”</p>
<i>Chapter 26. Sediment Management</i>		
	p. 26-23 lines 33-39	<p>Recommendation 1 states,</p> <p>“The State and USACE should convene a stakeholder working group that includes flood protection and water supply entities to recommend methods to overcome sediment management regulatory conflict and encourage long-term thinking, including the issuing of permits that match the time horizon for any established sediment management plan.”</p> <p>Metropolitan supports this recommendation as a means to protect and maintain facility capacity for water supply management.</p>